

Mr. Harry Morgan, Assistant Chief Engineer
Wishard Memorial Hospital
1001 W. 10th Street
Indianapolis, Indiana 46202

Re: 097-12474-00041
First Administrative Amendment to
TV 097-7884-00041

Dear Mr. Harry Morgan:

Wishard Memorial Hospital was issued a permit on May 19, 2000 for a General Medical and Surgical Hospital. A letter requesting an administrative amendment to the Title V permit was received on July 10, 2000. Wishard Memorial Hospital will be removing the existing dry-lime injector and baghouse and replacing the control devices with a wet scrubber system.

This change is a result of a physical and operational change made to the existing incinerator solely for the purpose of complying with emission limits contained in 326 IAC 11-6-4. Pursuant to 326 IAC 11-6-1(c) this change is not considered a modification and will not trigger 40 CFR 60, Subpart Ec applicability. In addition, pursuant to 326 IAC 1-2-23.5 the wet scrubber system does not meet the definition of "emission unit"; pursuant to 326 IAC 1-2-21 control equipment has been deleted from the definition of "construction"; pursuant to 326 IAC 1-2-42 the wet scrubber system does not meet the definition of "modification" under (1), (2), or (3) because, it is not considered an emission unit or construction and the physical change or change in the method of operation of the incinerator will not increase the potential to emit any regulated pollutant currently emitted or result in emission of any regulated pollutant not previously emitted.

Further, the current permit incorporates a Compliance Monitoring condition, D.2.11(a) which states, compliance monitoring shall be performed according to 40 CFR 60.57c, based on the type of control equipment installed. Condition D.2.14(b)(1) through (2) states, upon the compliance date, the Permittee must submit a semi-annual report, including the following information: (1) The values for the site-specific operating parameters, as applicable; (2) The highest maximum operating parameter and the lowest operating parameter, as applicable, for the year being reported;

Therefore, it is not necessary to change the compliance monitoring, record keeping or reporting condition.

Since the addition of the wet scrubber system is not considered a modification, an administrative amendment may be issued pursuant to the provisions of 326 IAC 2-7-11(a)(8). The permit is hereby administratively amended as follows:

Reviewer: Monica Dick

1. A changed to the facility description located on page 5 of 46 of the permit.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (b) One (1) large, Simond Manufacturing Corp, medical and general waste incinerator, constructed in 1993, identified as WDI-01 exhausting to stack/vent WDS-01, with an input capacity of 1500 pounds per hour, controlled by a ~~dry lime injector and baghouse~~ **wet scrubber system**.

2. The same change to the corresponding facility description of Section D.2 on page 33 of 46.

SECTION D. 2 FACILITY OPERATION CONDITIONS - Medical waste incinerator

Facility Description [326 IAC 2-7-5(15)]

One (1) large, Simond Manufacturing Corp, medical and general waste incinerator, constructed in 1993, identified as WDI-01 exhausting to stack/vent WDS-01, with an input capacity of 1500 pounds per hour, controlled by a ~~dry lime injector and baghouse~~ **wet scrubber system**.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Monica Dick, at (317) 327-2512.

Sincerely,

Mona A. Salem, Chief Operating Officer
Department of Public Works
City of Indianapolis

Attachments

M.D.

cc: U.S. EPA, Region V
Mindy Hahn, IDEM OAM

**PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT
and Indianapolis Environmental Resource
Management Division**

**Wishard Memorial Hospital
1001 W. 10th Street
Indianapolis, Indiana 46202**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15, IC 13-17 and the Code of Indianapolis and Marion County, Chapter 511.

Operation Permit No.: T097-7884-00041	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management Mona A. Salem, Chief Operating Officer Department of Public Works City of Indianapolis	Issuance Date: May 19, 2000
Second Administrative Permit Amendment: AAF097-12474-00041	Pages Affected: 1, 5, 33
Issued by: Mona A. Salem Chief Operating Officer Department of Public Works City of Indianapolis	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and The Indianapolis Environmental Resource Management Division (ERMD). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates stationary source General Medical and Surgical Hospital.

Responsible Official: Douglas L. Elwell, President & Executive Director
Source Address: 1001 W. 10th Street, Indianapolis, Indiana 46202
Mailing Address: 1001 W. 10th Street, Indianapolis, Indiana 46202
Phone Number: 317-630-6855
SIC Code: 8062
County Location: Marion
County Status: Nonattainment for Particulate Material
Attainment for all other criteria pollutants

Source Status: Part 70 Permit Program
Minor Source, under PSD; and
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Three (3) 24.1 mmBtu Cleaver Brooks natural gas and Number 2 fuel oil fired boilers, constructed in 1987, identified as WDBO-01, WDBO-02, and WDBO-03 each exhausting to stack/vent WDS-03 with a production capacity of 20,000 pounds per hour of steam.
- (b) One (1) large, Simond Manufacturing Corp, medical and general waste incinerator, constructed in 1993, identified as WDI-01 exhausting to stack/vent WDS-01, with an input capacity of 1500 pounds per hour, controlled by a wet scrubber system.
- (c) Two (2) #2 fuel oil storage tanks, identified as WDT-01 and WDT-02 exhausting to stack/vent WDV-01 and WDV-02, constructed in 1987, each with a storage capacity of 15,000 gallons equivalent to 56.78 cubic meters (m³)

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Space heaters, process heaters, or boilers using the following fuels.

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

SECTION D. 2 FACILITY OPERATION CONDITIONS - Medical waste incinerator

Facility Description [326 IAC 2-7-5(15)]

One (1) large, Simond Manufacturing Corp, medical and general waste incinerator, constructed in 1993, identified as WDI-01 exhausting to stack/vent WDS-01, with an input capacity of 1500 pounds per hour, controlled by a wet scrubber system.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Burning Regulations for Incinerators (PM) [326 IAC 4-2]

Pursuant to 326 IAC 4-2-2, Burning Regulations for Incinerators, the medical and general waste incinerator identified as WDI-01, shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning wood products.
- (c) Comply with 326 IAC 5-1 (Opacity limitations).
- (d) Be maintained properly as specified by the manufacturer and approved by IDEM.
- (e) Be operated according to the manufacturer's recommendation and only burn waste approved by IDEM.
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.
- (g) Be operated so that emissions of hazardous materials including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented.
- (h) Not create a nuisance or a fire hazard.
- (i) Not emit particulate matter in excess of three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.

The operation of the incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

D.2.2 Carbon Monoxide [326 IAC 9-1-2]

Pursuant to 326 IAC 9-1-2(3), Carbon Monoxide emission limits for refuse incineration and burning equipment, the Simond Manufacturing Corporation Incinerator, identified as WDI-01, shall not discharge carbon monoxide unless the waste gas stream is burned in a direct-flame afterburner or is controlled by other means approved by the commissioner.

D.2.3 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart Ce.

D.2.4 Hospital/Medical/Infectious Waste Incinerators [326 IAC 11-6]

- (a) The medical waste incinerator is subject to 326 IAC 11-6 and 40 CFR 60, Subpart Ce with a compliance date of one year after the effective date of the rule, unless the facility is undergoing retrofit to come into compliance where compliance is required no later than March 31, 2002.
- (b) Pursuant to 326 IAC 11-6 and 40 CFR 60, Subpart Ce, the medical waste incinerator shall comply with the following emission limits:

- (1) Particulate Matter emissions shall not exceed 0.015 grains per dry